REMARKS

Introduction

Upon entry of the foregoing amendment, claims 1-24, 26-32, 34, 35, 40, 41, 47, 49, 52-61, 63, 64, 66, 67, and 69-72 are pending in the application. Claims 1-19 are allowed. No claims have been amended. No new matter is being presented. In view of the following remarks, reconsideration and allowance of all the pending claims are requested.

1. Improper rejections:

On page 15 of the Office action of June 5, 2007 (hereinafter the "Office Action"), the Examiner has rejected claims 21-24, 26-29, 32, and 66 under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 5,949,504 to Kim and further in view of U.S. Patent No. 5,661,632 to Register. Similarly, on page 20 of the Office Action, the Examiner rejects claims 54 and 66 as being unpatentable over Kim "as applied to claim 52 above", and further in view of Register. Applicants respectfully submit that these rejections are improper.

In particular, claims 21-24, 26-29, and 32 all depend from independent claim 20, which is not rejected over Kim in view of Register, but instead requires additional references for the Examiner to propose a rejection of this claim, and accordingly, since these dependent claims incorporate all of the limitations present in claim 20, claims 21-24, 26-29, and 32 cannot be rejected by Kim in view of Register. Similarly, claims 54 and 66 also depend from independent claims 52 and 40, respectively, which are also not rejected over Kim in view of Register, and thus, claims 54 and 66 cannot be rejected by Kim in view of Register. Additionally, claims 30 and 31 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Kim and further in view of U.S. Patent No. 5,329,289 to Sakamoto et al. However, claims 30 and 31 depend from claim 20, which is also not rejected over Kim and Sakamoto, and thus claims 30 and 31 cannot be rejected by Kim in view of Sakamoto.

Accordingly, Applicant has not been given a clear grounds of rejections for these claims, i.e. a full and fair hearing to ascertain the advisability of an appeal, and further request that if the Examiner's rejections are maintained, a new office action is required that adequately addresses

all of the limitations recited within the claims, completely addresses each and every argument forwarded by Applicants, and appropriately directs the Applicants to references the Examiner alleges teach or disclose the invention as claimed.

2. Rejection under 35 USC §112, first paragraph:

Claims 47, 49, and 57-60 have been rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. The Applicant traverses this rejection for at least the following reasons.

a. Claims 47 and 49:

With respect to claims 47 and 49, it is respectfully submitted that claims 47 and 49 are adequately supported by the specification. For example, Col. 6, lines 1-15, describes that an OSD generator 700 is activated in response to the user's pressing a key of the key pad 1105. Clearly, the display is powered on, or the key would not function. This exemplifies receiving a selection of a function key while the screen is powered on but the OSD is not being displayed, as recited in these claims. Accordingly, withdrawal of this rejection is requested.

b. Claims 57-60:

With respect to claims 57-60, it is respectfully submitted that claims 57 and 59 are adequately supported by the specification. Furthermore, since claims 58 and 60 are rejected only for depending from claims 57 and 59, respectively, claims 57-60 are all adequately supported by the specification. For example, Col. 3, lines 48-68, and Col. 4, lines 1-35 describe "externally inputted R-G-B video signals" which are exemplary of the claimed "external color component video signal," which after formatting are referred to as "first R-G-B signals 701" (col. 4, line 12), and outputted "second R-G-B signals 801" (col. 4, line 46) converted from the first signals. The signals 801 are exemplary of the claimed "internal OSD color component video signal." Accordingly, claims 57-60 are adequately supported by the specification, and withdrawal of the rejection is requested.

3. Rejection under 35 USC §102(b): Kishimoto et al.:

Claims 34-35, 61, and 67 have been rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,134,390 to Kishimoto et al. Applicants traverse this rejection for at least the following reasons.

a. Claim 34:

With respect to claim 34, on pages 3-4 of the Office Action, the Examiner alleges that Kishimoto et al. discloses all of the limitations recited in this claim. However, Applicant respectfully submits that Kishimoto et al. does not disclose or teach all of the limitations of the invention as recited in claim 34, for at least the following reasons.

Kishimoto et al. describes a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. That is, in Kishimoto et al. the images are previously stored in an upright or lateral position, and are fed to the display either upright or laterally. The orientation of the display is then changed to correspond with the lateral or upright position of the previously stored image. *See* Kishimoto et al., Col. 4, lines 64+, Col. 5, lines 1-5. Kishimoto et al. fails to describe Applicant's key manipulation to generate a mode signal to display an OSD at a rotated position, and thus does not teach or suggest, among other things, "modifying OSD data corresponding to the first image including the OSD with respect to a position of the rotatable screen when the screen is rotated, according to a key manipulation," as recited in claim 34.

Furthermore, Kishimoto et al. describes character data 51 which is superimposed or mixed with image data 52 in the display. *See* Kishimoto et al., col. 5, lines 40-53. That is, the image data 52 and the character data 51 are independent of each other. This is not the same as "displaying the first image that corresponds to the modified OSD data on the second image displayed on the rotatable screen," as recited in claim 34.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as contained in the...claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

"The elements must be arranged as required by the claim..." In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

Accordingly, since Kishimoto et al. does not teach all of the elements set forth in independent claim 34, independent claim 34 is patentably distinguishable over Kishimoto et al., and withdrawal of this rejection and allowance of this claim are respectfully solicited.

b. Claim 35

With respect to claim 35, on page 4 of the Office Action, the Examiner alleges that Kishimoto et al. discloses all of the limitations recited in this claim. However, Applicant respectfully submits that Kishimoto et al. does not disclose or teach all of the limitations of the invention as recited in claim 35, for at least the following reasons.

As described above, Kishimoto et al. describes a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. That is, in Kishimoto et al. the orientation of the display is changed to correspond with the lateral or upright position of the previously stored image. *See* Kishimoto et al., Col. 4, lines 64+, Col. 5, lines 1-5. Kishimoto et al. fails to describe Applicant's key manipulation to generate a mode signal to display an OSD at a rotated position, and thus does not teach or suggest, among other things, "a controller to generate a mode signal indicating a rotated state of the screen body according to a key manipulation," and "a circuit unit to display the picture of the externally inputted video signals on the screen body and to display the OSD image at a rotated position in accordance with the mode signal on the displayed picture," as recited in claim 35.

Accordingly, since Kishimoto et al. does not teach all of the elements set forth in independent claim 35, independent claim 35 is patentably distinguishable over Kishimoto et al., and withdrawal of this rejection and allowance of this claim are respectfully solicited.

c. Claims 61 and 67:

With respect to dependent claims 61 and 67, it is respectfully submitted that for at least the reason that claims 61 and 67 depend from independent claim 34, which is allowable over

Kishimoto et al. for at least the reasons described above, these claims are also allowable over Kishimoto et al. Accordingly, withdrawal of this rejection and allowance of these claims are respectfully requested.

4. Rejection under 35 USC §103(a): Kim and Kishimoto:

Claims 20, 40, 41, 52-53, 55-56, 63, 69, 71, and 72 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,949,504 to Kim and further in view of Kishimoto et al. The Applicant respectfully traverses this rejection for at least the following reasons.

a. Claim 20:

With respect to independent claim 20, on pages 6-7 of the Office Action, the Examiner alleges that Kim discloses all of the limitations of the invention as recited in this claim, except that "Kim does not explicitly disclose the OSD image is rotated with respect to the screen body in response to the mode signal." The Examiner then alleges that "Kishimoto discloses a rotatable screen in which the OSD is rotate in accordance with rotated display mode (Figure 6, item 66 and 69). *See* Office Action, page 7. However, the Applicant respectfully submits that neither Kim nor Kishimoto et al., either individually or combined, disclose the Applicant's invention as recited in independent claim 20, for at least the following reasons.

Kim describes an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract. That is, as illustrated in FIGS. 3A and 3B of Kim, an LCD monitor used as a viewfinder in a camcorder can be tilted to a predetermined angle with respect to a body of the camcorder if a viewing angle control option has been selected. *See* Kim, Col. 5, lines 40-50. Further, Kim describes that a main controller 41 of the camcorder can provide a signal to the OSD to display a viewing angle control amount signal in the LCD monitor. *See* Kim, Col. 4, lines 64+, Col. 5, lines 1-7. In other words, Kim describes a method to vary the angle of the camcorder's viewfinder when the camcorder itself is tilted so that a user can continue to monitor the picture being recorded irrespective of the movement/tilt of the camcorder. *See* Kim, Col. 5, lines 30-40.

However, contrary to what is described in Kim, the Examiner alleges that Kim discloses

the limitations recited in this claim, and in particular, "displaying a picture of externally inputted color component video signals on the screen body and displaying the OSD image on the displayed picture at a rotated position in accordance with the mode signal," as recited in claim 20, by alleging that Kim discloses:

> "The mixer 16 mixes the signals which are output from the D/A converter 15 after being separated into the luminance signal Y and the color signals C in the D/A converter 15, and outputs a composite video signal to the LCD monitor 51," column 3, line 66- column 4, line 3, and "The main controller 41 outputs the OSD control signal to the OSD portion 70 so that the LCD monitor display viewing angle control amount is displayed as the OSD character," column 4, line 67- column 5, line 4).

Nonetheless, as explained above, the cited language describes how a viewing angle control signal and an amount of view angle correction can be displayed in the viewfinder over the recorded image. *See* Kim, Col. 4, lines 64+, Col. 5, lines 1-7. Kim does not describe displaying a rotated image, and among other things, does not disclose, teach, or suggest, "displaying the OSD image on the displayed picture at a rotated position in accordance with the mode signal," as recited in claim 20.

Similarly, as described above, Kishimoto et al. is directed to a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. That is, in Kishimoto et al. the orientation of the display is changed to correspond with the lateral or upright position of the previously stored image. *See* Kishimoto et al., Col. 4, lines 64+, Col. 5, lines 1-5. Kishimoto et al. fails to describe Applicant's key manipulation to generate a mode signal to display an OSD at a rotated position, or rotating an image according the mode signal before displaying it, and thus, does not teach or suggest, among other things, "generating a mode signal indicating a rotated state of the screen body according to manipulation of a key," or "displaying a picture of externally inputted color component video signals on the screen body and displaying the OSD image on the displayed picture at a rotated position in accordance with the mode signal," as recited in claim 20.

Furthermore, as explained above, Kim is directed to an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract. That is, as illustrated in FIGS. 3A and 3B of Kim, an LCD monitor used as a viewfinder in a camcorder can be tilted to a predetermined

angle with respect to a body of the camcorder if a viewing angle control option has been selected. *See* Kim, Col. 5, lines 40-50. On the other hand, Kishimoto et al. is directed to a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. The Examiner has not explained any motivation to combine the tilting movement of Kim's viewfinder to correspond with a tilt of a camcorder, with the motorized movement of Kishimoto et al.'s monitor to correspond with the lateral or upright orientation of stored images, or how such a combination would result in the invention as claimed, especially in view of the deficiencies of Kim as pointed out above.

Accordingly, Kim and Kishimoto et al. are not combinable to disclose the invention as recited in claim 20, and neither Kim nor Kishimoto et al., either individually or in combination, meet all of the features recited in this claim. Therefore, withdrawal of this rejection and allowance of this claim are earnestly solicited.

b. Claim 40:

With respect to independent claim 40, on pages 7-8 of the Office Action, the Examiner alleges that Kim discloses all of the limitations of the invention as recited in this claim, except that "Kim does not explicitly disclose the OSD image is rotated with respect to the screen body in response to the mode signal." The Examiner then alleges that "Kishimoto discloses a rotatable screen in which the OSD is rotate in accordance with rotated display mode (Figure 6, item 66 and 69). *See* Office Action, page 8. However, the Applicant respectfully submits that neither Kim nor Kishimoto et al., either individually or combined, disclose the Applicant's invention as recited in independent claim 40, for at least the following reasons.

As described above, Kim is directed to an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract. That is, as illustrated in FIGS. 3A and 3B of Kim, an LCD monitor used as a viewfinder in a camcorder can be tilted to a predetermined angle with respect to a body of the camcorder if a viewing angle control option has been selected. *See* Kim, Col. 5, lines 40-50. Further, Kim describes that a main controller 41 of the camcorder can provide a signal to the OSD to display a viewing angle control amount signal in the LCD monitor. *See* Kim, Col. 4, lines 64+, Col. 5, lines 1-7. In other words, Kim describes a method to vary the angle of the camcorder's viewfinder when the camcorder itself is tilted so

that a user can continue to monitor the picture being recorded irrespective of the movement/tilt of the camcorder. *See* Kim, Col. 5, lines 30-40. Kim does not describe displaying a rotated image, and does not disclose, teach, or suggest, among other things, "displaying the first image corresponding to the modified OSD data on the second image displayed on the rotated screen," as recited in claim 40.

Furthermore, as described above, Kim describes displaying a viewing angle control amount signal over the image displayed in the view finder. Kim does not describe modifying the image displayed in the camcorder or rotating the viewing angle control amount signal in a way such that it describes "modifying OSD data corresponding to the first image including the OSD color component video signal with respect to an angle of rotation of the screen when the screen is rotated, according to manipulation of a key," and "displaying the first image corresponding to the modified OSD data on the second image displayed on the rotated screen," as recited in claim 40.

Similarly, as described above, Kishimoto et al. is directed to a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. That is, in Kishimoto et al. the orientation of the display is changed to correspond with the lateral or upright position of the previously stored image. *See* Kishimoto et al., Col. 4, lines 64+, Col. 5, lines 1-5. Kishimoto et al. fails to describe Applicant's key manipulation to generate a mode signal to display an OSD at a rotated position, or rotating an image according the mode signal before displaying it, and thus, does not teach or suggest, among other things, "modifying OSD data corresponding to the first image including the OSD color component video signal with respect to an angle of rotation of the screen when the screen is rotated, according to manipulation of a key," and "displaying the first image corresponding to the modified OSD data on the second image displayed on the rotated screen," as recited in claim 20.

Furthermore, Kishimoto et al. describes character data 51 which is superimposed or mixed with image data 52 in the display. *See* Kishimoto et al., col. 5, lines 40-53. That is, the image data 52 and the character data 51 are independent of each other. This is not the same as "displaying the first image corresponding to the modified OSD data on the second image displayed on the rotated screen," as recited in claim 40.

Moreover, as explained above, Kim is directed at an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract. That is, as illustrated in FIGS. 3A and 3B of Kim, an LCD monitor used as a viewfinder in a camcorder can be tilted to a predetermined angle with respect to a body of the camcorder if a viewing angle control option has been selected. *See* Kim, Col. 5, lines 40-50. On the other hand, Kishimoto et al. is directed to a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. The Examiner has not explained any motivation to combine the tilting movement of Kim's viewfinder to correspond with a tilt of a camcorder, with the motorized movement of Kishimoto et al.'s monitor to correspond with the lateral or upright orientation of stored images, or how such a combination would result in the invention as claimed, especially in view of the deficiencies of Kim as pointed out above.

Accordingly, Kim and Kishimoto et al. are not combinable to disclose the invention as recited in claim 40, and neither Kim nor Kishimoto et al., either individually or in combination, meet all of the features recited in this claim. Therefore, withdrawal of this rejection and allowance of this claim are earnestly solicited.

c. Claims 41, 63, and 69:

With respect to dependent claims 41, 63, and 69, it is respectfully submitted that for at least the reason that these claims depend from independent claim 40, which is allowable for at least the reasons provided above, and therefore contain each of the features as recited in independent claim 40, claims 41, 63, and 69 are also allowable over Kim and Kishimoto et al., either individually or combined.

Furthermore, as described above, Kim describes that a main controller 41 of the camcorder can provide a signal to the OSD to display a viewing angle control amount signal in the LCD monitor. *See* Kim, Col. 4, lines 64+, Col. 5, lines 1-7. In other words, Kim overlays a viewing angle control amount signal over the target image of the camcorder displayed in the view finder. The viewing angle control amount signal and a recorded image displayed in the viewfinder are not related, and thus, Kim cannot describe or teach "wherein the displaying of the first image corresponding to the modified OSD data on the second image displayed on the rotated screen comprises displaying the first image in a center of the rotated screen," as recited

in claim 63. Similarly, Kishimoto et al. describes character data 51 which is superimposed or mixed with image data 52 in the display. *See* Kishimoto et al., col. 5, lines 40-53. That is, the image data 52 and the character data 51 are independent of each other. This is not the same as "wherein the displaying of the first image corresponding to the modified OSD data on the second image displayed on the rotated screen comprises displaying the first image in a center of the rotated screen," as recited in claim 63.

With respect to claim 69, the Applicant reiterates that Kishimoto converts "in accordance with" display area shape and dimension, while claim 69 generally recites that an OSD of a first image "indicates" a size of a second image. While the reference discloses "accordance," the Applicant's claims recite "indicates," which is a much more specific term. Since the term "indicates" help establish the boundaries of the patent protection sought, claim 69 is definite, complies with the requirements of 35 U.S.C. 112, second paragraph, and should be Examined accordingly. That is, considering all of the terms recited in the claim, and how they help define the scope of the invention. *See also* MPEP 2173.05(b).

d. Claim 52:

With respect to independent claim 52, on pages 9-10 of the Office Action, the Examiner alleges that Kim discloses all of the limitations of the invention as recited in claim 52, except that "Kim does not explicitly disclose the OSD image is rotated with respect to the screen body in response to the mode signal." The Examiner then alleges that "Kishimoto discloses a rotatable screen in which the OSD is rotate in accordance with rotated display mode (Figure 6, item 66 and 69). *See* Office Action, page 10. However, the Applicant respectfully submits that neither Kim nor Kishimoto et al., either individually or combined, disclose the Applicant's invention as recited in independent claim 52, for at least the following reasons.

As describe above, the Examiner admits that Kim does not teach or suggest rotating an OSD image. Furthermore, Kishimoto et al. describes a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. That is, in Kishimoto et al. the images are previously stored in an upright or lateral position, and are fed to the display either upright or laterally. The orientation of the display is then changed to correspond with the lateral or upright position of the previously

stored image. *See* Kishimoto et al., Col. 4, lines 64+, Col. 5, lines 1-5. Kishimoto et al. fails to describe rotating the image in response to a mode signal, instead describes rotating a monitor according to orientation data of the image to conform the orientation of the monitor to the image.

Accordingly, Kishimoto et al. also does not teach or suggest "a circuit unit to drive the display unit to display the external image signal and to drive the display unit to display the internal OSD image signal at a rotated position in accordance with the mode signal generated by the control unit," as recited in claim 52.

Furthermore, Kim does not show any key manipulation to feed back the information of the position and direction of the LCD panel to the main controller 41 and to display the LCD monitor display viewing angle control amount signal in a predetermined position on the LCD monitor 60. That is, Kim fails to disclose or teach "a control unit to generate a mode signal indicating a rotated state of the display unit according to a key manipulation," in the same manner that Kishimoto fails to show Applicant's key manipulation to generate a mode signal to display an OSD at a rotated position, or "a control unit to generate a mode signal indicating a rotated state of the display unit according to a key manipulation," as recited in this claim.

Moreover, as explained above, Kim is directed at an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract. That is, as illustrated in FIGS. 3A and 3B of Kim, an LCD monitor used as a viewfinder in a camcorder can be tilted to a predetermined angle with respect to a body of the camcorder if a viewing angle control option has been selected. *See* Kim, Col. 5, lines 40-50. On the other hand, Kishimoto et al. is directed to a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. The Examiner has not explained any motivation to combine the tilting movement of Kim's viewfinder to correspond with a tilt of a camcorder, with the motorized movement of Kishimoto et al.'s monitor to correspond with the lateral or upright orientation of stored images, or how such a combination would result in the invention as claimed, especially in view of the deficiencies of Kim as pointed out above.

Accordingly, Kim and Kishimoto et al. are not combinable to disclose the invention as recited in claim 52, and neither Kim nor Kishimoto et al., either individually or in combination, meet all of the features recited in this claim. Therefore, withdrawal of this rejection and allowance of this claim are earnestly solicited.

e. Claim 53:

With respect to dependent claim 53, it is respectfully submitted that for at least the reason that this claim depends from independent claim 52, which is allowable for at least the reasons provided above, and therefore contains each of the features as recited in independent claim 52, claim 53 is also allowable over Kim and Kishimoto et al., either individually or combined.

f. Claim 55:

With respect to independent claim 55, on page 11 of the Office Action, the Examiner rejects claim 55 for the reasons applied to claim 52 above. However, the Applicant respectfully also submits that neither Kim nor Kishimoto et al., either individually or combined, disclose the Applicant's invention as recited in independent claim 55, for at least the following reasons.

As describe above, the Examiner admits that Kim does not teach or suggest rotating an OSD image. Furthermore, Kishimoto et al. describes a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. That is, in Kishimoto et al. the images are previously stored in an upright or lateral position, and are fed to the display either upright or laterally. The orientation of the display is then changed to correspond with the lateral or upright position of the previously stored image. *See* Kishimoto et al., Col. 4, lines 64+, Col. 5, lines 1-5. Kishimoto et al. fails to describe rotating the image in response to a mode signal, instead describes rotating a monitor according to orientation data of the image to conform the orientation of the monitor to the image.

Accordingly, Kishimoto et al. also does not teach or suggest "driving the display unit to display the received external image signal and driving the display unit to display the generated internal OSD image signal at a rotated position in accordance with the generated mode signal," as recited in claim 55.

Furthermore, Kim does not show any key manipulation to feed back the information of the position and direction of the LCD panel to the main controller 41 and to display the LCD monitor display viewing angle control amount signal in a predetermined position on the LCD monitor 60. That is, Kim fails to disclose or teach "generating a mode signal indicating a rotated state of the display unit according to manipulation of a function key," in the same manner that

Kishimoto fails to show Applicant's key manipulation to generate a mode signal to display an OSD at a rotated position, or "generating a mode signal indicating a rotated state of the display unit according to manipulation of a function key," as recited in this claim.

Moreover, as explained above, Kim is directed to an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract. That is, as illustrated in FIGS. 3A and 3B of Kim, an LCD monitor used as a viewfinder in a camcorder can be tilted to a predetermined angle with respect to a body of the camcorder if a viewing angle control option has been selected. *See* Kim, Col. 5, lines 40-50. On the other hand, Kishimoto et al. is directed to a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. The Examiner has not explained any motivation to combine the tilting movement of Kim's viewfinder to correspond with a tilt of a camcorder, with the motorized movement of Kishimoto et al.'s monitor to correspond with the lateral or upright orientation of stored images, or how such a combination would result in the invention as claimed, especially in view of the deficiencies of Kim as pointed out above.

Accordingly, Kim and Kishimoto et al. are not combinable to disclose the invention as recited in claim 55, and neither Kim nor Kishimoto et al., either individually or in combination, meet all of the features recited in this claim. Therefore, withdrawal of this rejection and allowance of this claim are earnestly solicited.

g. Claim 56:

With respect to dependent claim 56, it is respectfully submitted that for at least the reason that this claim depends from independent claim 55, which is allowable for at least the reasons provided above, and therefore contains each of the features as recited in independent claim 55, claim 56 is also allowable over Kim and Kishimoto et al., either individually or combined.

h. Claim 71:

With respect to independent claim 71, on pages 11-12 of the Office Action, the Examiner alleges that Kim discloses all of the limitations of the invention as recited in claim 71, except that "Kim does not explicitly disclose the OSD image is rotated with respect to the screen body in

response to the mode signal." The Examiner then alleges that "Kishimoto discloses a rotatable screen in which the OSD is rotate in accordance with rotated display mode (Figure 6, item 66 and 69). *See* Office Action, page 10. However, the Applicant respectfully submits that neither Kim nor Kishimoto et al., either individually or combined, disclose the Applicant's invention as recited in independent claim 71, for at least the following reasons.

As described above with respect to claims 52 and 55, the Examiner admits that Kim does not teach or suggest rotating an OSD image. Furthermore, in Kishimoto et al. the images are previously stored in an upright or lateral position, and are fed to the display either upright or laterally. The orientation of the display is then changed to correspond with the lateral or upright position of the previously stored image. *See* Kishimoto et al., Col. 4, lines 64+, Col. 5, lines 1-5. Kishimoto et al. fails to describe rotating the image in response to a mode signal, instead describes rotating a monitor according to orientation data of the image to conform the orientation of the monitor to the image. Accordingly, neither Kim nor Kishimoto et al. teach or suggest, among other things, "wherein the OSD image is rotated with respect to the screen body in response to the mode signal," as recited in claim 71.

Moreover, as explained above, Kim is directed at an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract. That is, as illustrated in FIGS. 3A and 3B of Kim, an LCD monitor used as a viewfinder in a camcorder can be tilted to a predetermined angle with respect to a body of the camcorder if a viewing angle control option has been selected. *See* Kim, Col. 5, lines 40-50. On the other hand, Kishimoto et al. is directed to a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. The Examiner has not explained any motivation to combine the tilting movement of Kim's viewfinder to correspond with a tilt of a camcorder, with the motorized movement of Kishimoto et al.'s monitor to correspond with the lateral or upright orientation of stored images, or how such a combination would result in the invention as claimed, especially in view of the deficiencies of Kim as pointed out above.

Accordingly, Kim and Kishimoto et al. are not combinable to disclose the invention as recited in claim 71, and neither Kim nor Kishimoto et al., either individually or in combination, meet all of the features recited in this claim. Therefore, withdrawal of this rejection and allowance of this claim are earnestly solicited.

i. Claim 72:

With respect to independent claim 72, on pages 13-14 of the Office Action, the Examiner alleges that Kim discloses all of the limitations of the invention as recited in claim 72, except that "Kim does not explicitly disclose the OSD image is rotated with respect to the screen body in response to the mode signal." The Examiner then alleges that "Kishimoto discloses a rotatable screen in which the OSD is rotate in accordance with rotated display mode (Figure 6, item 66 and 69). *See* Office Action, page 10. However, the Applicant respectfully submits that neither Kim nor Kishimoto et al., either individually or combined, disclose the Applicant's invention as recited in independent claim 72, for at least the following reasons.

As described above with respect to claims 52 and 55, the Examiner admits that Kim does not teach or suggest rotating an OSD image. Furthermore, in Kishimoto et al. the images are previously stored in an upright or lateral position, and are fed to the display either upright or laterally. The orientation of the display is then changed to correspond with the lateral or upright position of the previously stored image. *See* Kishimoto et al., Col. 4, lines 64+, Col. 5, lines 1-5. Kishimoto et al. fails to describe rotating the image in response to a mode signal, instead describes rotating a monitor according to orientation data of the image to conform the orientation of the monitor to the orientation of the image. Accordingly, neither Kim nor Kishimoto et al. teach or suggest, among other things, "wherein the OSD image is rotated with respect to the screen body in response to the mode signal," as recited in claim 72.

Moreover, as explained above, Kim is directed to an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract. That is, as illustrated in FIGS. 3A and 3B of Kim, an LCD monitor used as a viewfinder in a camcorder can be tilted to a predetermined angle with respect to a body of the camcorder if a viewing angle control option has been selected. *See* Kim, Col. 5, lines 40-50. On the other hand, Kishimoto et al. is directed to a filing system to display stored images in either a lateral or an upright position by changing the orientation of a display with a motor. *See* Kishimoto et al., abstract. The Examiner has not explained any motivation to combine the tilting movement of Kim's viewfinder to correspond with a tilt of a camcorder, with the motorized movement of Kishimoto et al.'s monitor to correspond with the lateral or upright orientation of stored images, or how such a combination would result in the invention as claimed, especially in view of the deficiencies of Kim as pointed out above.

Accordingly, Kim and Kishimoto et al. are not combinable to disclose the invention as recited in claim 72, and neither Kim nor Kishimoto et al., either individually or in combination, meet all of the features recited in this claim. Therefore, withdrawal of this rejection and allowance of this claim are earnestly solicited.

5. Rejection under 35 USC §103(a): Buxton et al. and Kim:

Claim 34 has been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,115,025 to Buxton et al. and further in view of Kim. The Applicant respectfully traverses this rejection for at least the following reasons.

With respect to independent claim 34, on pages 14-15 of the Office Action, the Examiner alleges that Buxton et al. discloses all of the limitations of the invention as recited in claim 34, except that "Buxton does not explicitly disclose the display mode could be modified by a key input." *See* Office Action, page 14. The Examiner then alleges that "Kim discloses an image display method in which the display mode could be modified by a key control (Fig. 1, item 42). *Id.* However, the Applicant respectfully submits that neither Buxton et al. nor Kim, either individually or combined, disclose the Applicant's invention as recited in independent claim 34, for at least the following reasons.

Buxton et al. is directed to maintaining an orientation of user interface elements on a display with respect to a user, despite rotation of the display. *See* Buxton et al., Col. 3, lines 57-65. However, as admitted by the Examiner, Buxton fails to show Applicant's key manipulation to generate a mode signal. Furthermore, Buxton does not disclose "displaying the first [OSD] image ... *on* the second image" as claimed (emphasis added). Buxton only mentions an OSD image and a second image that do not overlap. Nowhere does the reference state or illustrate that there is any overlap of the "model" 34 and the menu 30.

Similarly, as described above, Kim describes that a main controller 41 of the camcorder can provide a signal to the OSD to display a viewing angle control amount signal in the LCD monitor. *See* Kim, Col. 4, lines 64+, Col. 5, lines 1-7. The viewing angle control amount signal and a recorded image displayed in the viewfinder are not related, and thus, Kim cannot describe or teach "displaying the first image that corresponds to the modified OSD data on the second image displayed on the rotatable screen," as recited in claim 34.

Moreover, as explained above, Kim is directed to an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract. That is, as illustrated in FIGS. 3A and 3B of Kim, an LCD monitor used as a viewfinder in a camcorder can be tilted to a predetermined angle with respect to a body of the camcorder if a viewing angle control option has been selected. *See* Kim, Col. 5, lines 40-50. On the other hand, Buxton et al. is directed a flat panel display that can change three dimensional orientation, while maintaining a particular orientation of user interface elements displayed therein. *See* Buxton et al., abstract. The Examiner has not explained his motivation to combine the tilting movement of Kim's viewfinder to correspond with a tilt of a camcorder, with the orientation tracking and adjustment described in Buxton et al.'s system, or how such a combination would result in the invention as claimed, especially in view of the deficiencies of Buxton et al. and Kim as pointed out above.

Accordingly, Buxton et al. and Kim are not combinable to disclose the invention as recited in claim 34, and neither Buxton et al. nor Kim, either individually or in combination, meet all of the features recited in this claim. Therefore, withdrawal of this rejection and allowance of this claim are earnestly solicited.

6. Rejection under 35 USC §103(a): Kim and Register:

Claims 21-24, 26-29, 32, 54, and 66 have been rejected under 35 U.S.C. §103(a) as being obvious over Kim and further in view of U.S. Patent No. 5,661,632 to Register. The Applicant respectfully traverses this rejection for at least the following reasons.

a. Claims 21-24, 26-29, and 32:

With respect to claims 21-24, 26-29, and 32, it is respectfully submitted that for at least the reason that these claims depend from claim 20, which is not rejected as being unpatentable over Kim in view of Register, dependent claims 21-24, 26-29, and 32, which incorporate all the limitations of claim 20, also cannot be rejected over Kim and Register, either individually or combined.

Furthermore, for at least the reason that claims 21-24, 26-29, and 32 depend from claim 20, which is allowable over Kim and Kishimoto et al. for at least the reasons described above, claims 21-24, 26-29, and 32 are also allowable over Kim and Kishimoto et al. Moreover, since

Register does not teach or suggest any of the limitations of these claims which are lacking in Kim and Kishimoto et al., these claims are allowable over all these references, separately or combined.

Additionally, while the Examiner relies upon Register for its toggle switch that rotates the image, and asserts that this teaching would have been applied by one skilled in the art to Kim. The Applicant respectfully disagrees. Kim is directed to an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract. That is, as illustrated in FIGS. 3A and 3B of Kim, an LCD monitor used as a viewfinder in a camcorder can be tilted to a predetermined angle with respect to a body of the camcorder if a viewing angle control option has been selected. *See* Kim, Col. 5, lines 40-50. As admitted by the Examiner, "Kim does not explicitly disclose the OSD image is rotated with respect to the screen body in response to the mode signal." In fact, Kim does not describe rotating an image, apart from "tilting" the viewfinder to correspond to a tilt of the camcorder. If Register's toggle switch were added to rotate the image about a normal to the monitor 60, no benefit would result. The Examiner has not explained his motivation to combine the tilting movement of Kim's viewfinder to correspond with a tilt of a camcorder, with the handheld computer of Register.

Accordingly, since these references are not combinable to disclose or teach the invention as recited in these claims, claims 21-24, 26-29, and 32 are themselves patentable over Kim and Register, either individually or combined, and withdrawal of this rejection and allowance of these claims are respectfully requested.

b. Claim 54:

With respect to claim 54, it is respectfully submitted that for at least the reason that this claim depends from claim 52, which is not rejected as being unpatentable over Kim in view of Register, dependent claim 54, which incorporates all the limitations of claim 52, also cannot be rejected over Kim and Register, either individually or combined.

Furthermore, at least for the reason that this claim depends from claim 52, which is allowable over Kim and Kishimoto et al. for at least the reasons described above, claim 52 is also allowable over Kim and Kishimoto et al. Moreover, since Register does not teach or suggest the limitations of these claims which are lacking in Kim and Kishimoto et al., this claim

is allowable over all these references, separately or combined, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

c. Claim 66:

With respect to claim 66, it is respectfully submitted that for at least the reason that this claim depends from claim 40, which is not rejected as being unpatentable over Kim in view of Register, dependent claim 66, which incorporates all the limitations of claim 40, also cannot be rejected over Kim and Register, either individually or combined.

Furthermore, for at least the reason that this claim depends from claim 40, which is allowable over Kim and Kishimoto et al. for at least the reasons described above, claim 66 is also allowable over Kim and Kishimoto et al. Moreover, since Register does not teach or suggest the limitations of these claims which are lacking in Kim and Kishimoto et al., this claim is allowable over all these references, separately or combined, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

7. Rejection under 35 USC §103(a): Kim and Sakamoto:

Claims 30 and 31 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Kim and further in view of U.S. Patent No. 5,329,289 to Sakamoto et al. The Applicant respectfully traverses this rejection for at least the following reasons.

a. Claims 30 and 31:

With respect to claims 30 and 31, it is respectfully submitted that for at least the reason that these claims depend from claim 20, which is not rejected as being unpatentable over Kim in view of Register, dependent claims 30 and 31, which incorporate all the limitations of claim 20, also cannot be rejected over Kim and Register, either individually or combined.

Furthermore, for at least the reason that these claims depend from claim 20, which is allowable over Kim and Kishimoto et al. for at least the reasons described above, claims 30 and 31 are also allowable over Kim and Kishimoto et al. Moreover, since Sakamoto does not teach or suggest the limitations of these claims which are lacking in Kim and Kishimoto et al., these claims are allowable over all these references, separately or combined.

Moreover, the Applicant also respectfully traverses the assertion that it would have been obvious to combine Sakamoto with Kim so that Kim could display in a different mode. Kim is directed to an apparatus for adjusting a viewing angle of a viewfinder on a camcorder. *See* Kim, abstract, FIGS. 3A and 3B. In comparison to Kim, the display of Sakamoto rotates about a different axis of rotation for a different purpose. The Examiner has presented no specific advantage based in the prior art or the general knowledge in the field, as to why the references should be combined. Accordingly, since Kim and Sakamoto are not combinable to disclose or teach the limitations recited in claims 30 and 31, these claims are allowable over these two references, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

8. Rejection under 35 USC §103(a): Kishimoto et al. and Register:

Claim 64 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Kishimoto et al. and further in view of Register. The Applicant respectfully traverses this rejection for at least the following reasons.

With respect to claim 64, it is respectfully submitted that for at least the reason that this claim depends from claim 34, which is allowable over Kishimoto et al. for at least the reasons described above, claim 64 is also allowable over Kishimoto et al. Moreover, since Register does not teach or suggest the limitations of these claims which are lacking in Kishimoto et al., this claim is allowable over all Kishimoto et al. and Register, separately or combined, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

9. Rejection under 35 USC §103(a): Kim:

Claims 57-60 and 70 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Kim. The Applicant respectfully traverses this rejection for at least the following reasons.

a. Claim 57:

With respect to independent claim 57, on page 22-23 of the Office Action the Examiner alleges that Kim discloses all of the limitations of claim 57, and that "as for the internal OSD color signal that is colored, since the generated video image is colored, it would have been

obvious... ...to make the OSD display colored in order to commensurate the images."

However, the Applicant respectfully submits that Kim does not disclose, teach, or suggest all of the limitations of the invention as recited in claim 57, for at least the following reasons.

As described above with respect to claims 20 and 40, Kim fails to disclose the Applicant's first and second images and manipulation of a function key or a key manipulation, respectively, as recited in independent claims 57 and 59. In fact, the Examiner admits on page 10 of the Office Action that "Kim does not explicitly disclose one or more function keys to change operation settings thereof such that the circuit unit drives the display unit to display the internal OSD image signal in response to a selection of the one or more function keys."

Accordingly, among other things, Kim does not disclose, teach, or suggest, "a control unit to generate a mode signal indicating a rotated state of the display unit according to manipulation of a function key," and "a circuit unit to drive the display unit to display the internal OSD color component video signal on the image of the external color component video signal at a rotated position in accordance with the mode signal generated by the control unit," as recited in claim 57 or "generating a mode signal indicating a rotated state of the display unit according to a key manipulation. Accordingly, withdrawal of this rejection and allowance of this claim are respectfully requested.

b. Claims 58 and 70:

Applicant respectfully submits that claims 58 and 70 are allowable over Kim for at least the dependency of these claims on allowable claim 57.

c. Claim 59:

With respect to independent claim 59, on page 23 of the Office Action the Examiner rejects this claim based on the reasons presented above with respect to claim 57. However, the Applicant respectfully submits that Kim does not disclose, teach, or suggest all of the limitations of the invention as recited in claim 59, for at least the following reasons.

As described above with respect to claims 20 and 40, Kim fails to disclose the Applicant's first and second images and manipulation of a function key or a key manipulation,

respectively, as recited in independent claims 57 and 59. In fact, the Examiner admits on page 10 of the Office Action that "Kim does not explicitly disclose one or more function keys to change operation settings thereof such that the circuit unit drives the display unit to display the internal OSD image signal in response to a selection of the one or more function keys."

Accordingly, among other things, Kim does not disclose, teach, or suggest, "generating a mode signal indicating a rotated state of the display unit according to a key manipulation," and "driving the display unit to display the generated internal OSD color component video signal on the image of the external color component video signal at a rotated position in accordance with the generated mode signal," as recited in claim 59. Accordingly, withdrawal of this rejection and allowance of this claim are respectfully requested.

d. Claim 60:

Applicant respectfully submits that claim 60 is allowable over Kim for at least the dependency of this claim on allowable claim 59.

Conclusion

It is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, there being no other objections or rejections, this application is in condition for allowance, and a notice to this effect is earnestly solicited.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided below.

If any further fees are required in connection with the filing of this amendment, please charge the same to out Deposit Account No. 502827.

Respectfully submitted,

STANZIONE & KIM, LLP

Dated: September 4, 2007

By: _____

919 18th St., NW, Suite 440
Washington, DC 20006
Telephone: (202) 775-1900
Facsimile: (202) 775-1901

Manuel A. Cordovez
Registration No. 58,480